

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:)	Case No. 20-21603 CMB
)	Chapter 13
Michael Paul Skidmore,)	
<i>Debtor</i>)	Docket No.
)	
Michael Paul Skidmore,)	
<i>Movant</i>)	Related to Claim No. 4
)	
vs.)	
)	
Carrington Mortgage Services, LLC,)	
<i>Respondent</i>)	

OBJECTION TO RESPONDENT'S NOTICE OF MORTGAGE PAYMENT CHANGE

AND NOW, comes the debtor, Michael Paul Skidmore, by and through his attorney Julie Frazee Steidl, and Steidl and Steinberg, and respectfully represent as follows:

1. This case was commenced on May 22, 2020, when the debtor filed a voluntary petition under Chapter 13 of the Bankruptcy Code.
2. Movant owns the residence located at 100 Center Avenue Burgettstown, PA 15021.
3. Respondent holds the first mortgage on Movant residence.
4. On December 6, 2021, this Honorable court approved the Permanent Loan Modification agreement between the Movant and the Respondent, setting the New Total Monthly Payment at \$730.14, which is comprised of principal & interest of \$506.40 and an escrow component of \$223.74.
5. On July 21, 2022, Respondent filed a Notice of Mortgage Payment Change (hereinafter "the Notice") indicating that the monthly mortgage payment will increase to \$897.55 effective September 1, 2022.
6. The annual disclosure statement attached to the notice indicates that the monthly principal and interest component is \$688.93.
7. There is no explanation of why the principal and interest payment has increased \$182.53 from the approved Permanent Loan Modification.

8. The Notice of Mortgage Payment Change should be stricken and the monthly mortgage payment should be \$715.02 based on principal & interest of \$506.40 and escrow of \$208.62, which is the escrow amount listed on the notice.

WHEREFORE, the debtor, Michael Paul Skidmore, respectfully requests this Honorable Court to strike Respondent's Notice of Mortgage Payment Change filed on July 21, 2022.

Respectfully submitted,

August 1, 2022
DATE

/s/ Julie Frazee Steidl
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